



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION X

1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

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7/16/81

REPLY TO
ATTN OF:

M/S 524

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

JUL 11 1984
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OLYMPIA, WA 98504

DEPARTMENT OF ECOLOGY

Mr. Mike Mattingley
President
Resource Recovery Corporation
5501 Airport Way South
Seattle, Washington 98108

Dear Mr. Mattingley:

In December 1983 the Environmental Protection Agency announced initiation of a National Dioxin Strategy. Its purpose is to determine the extent of contamination of the environment by a particularly toxic isomer of dioxin, 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD). In most cases where significant environmental levels of TCDD have been found, it is associated with the manufacture or use of the chemical 2,4,5-trichlorophenol (2,4,5-TCP) and its derivatives or the wastes generated therefrom.

The Rhone-Poulenc Chemical Company in Portland, Oregon, previously known as Chipman Chemical Company and Rhodia, Incorporated, has used 2,4,5-TCP as a precursor in its pesticide manufacturing process. In response to a question from this Agency, Rhone-Poulenc identified you as a recipient of some of their wastes. Your assistance is needed as we develop an appropriate sampling plan for your site.

2,3,7,8-TCDD is a hazardous waste within the meaning of the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Under the provisions of Section 3007 of RCRA and Section 104 of CERCLA, the Administrator of EPA has the authority to require any person who generates, stores, treats, transports, disposes of, (or otherwise handles) or has handled hazardous substances and wastes to furnish information related to such substances and wastes. We are requesting you to answer the questions in Enclosure A and return your reply within 30 days of receipt of this request.

Pursuant to Section 103 of CERCLA, it is unlawful for any person knowingly to destroy, mutilate, erase, dispose of, conceal, or otherwise render unavailable or unreadable or falsify any documents. The term "documents" or "documentation" means writings (handwritten, typed, or otherwise produced or reproduced) and includes but is not limited to any invoices, checks, receipts, correspondence, offers, contracts, agreements, manifests, logs, minutes of meetings, memorandums, notes, calendar or

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diary entries, charts, maps, photographs, drawings, manuals, reports of analysis, analytical worksheets, chromatographs, studies, reports of scientific study or investigation, telegrams, teletypes, magnetic tapes, punch cards, recording disks, computer printouts, or other data : compilations from which information can be obtained or translated.

Under Section 3008 of RCRA, failure to comply with this request may result in an order requiring compliance or a civil action for appropriate relief. Section 106 of CERCLA and Section 3008 of RCRA also provide for civil penalties.

EPA regulations governing confidentiality of business information are set forth in Title 40 of the Code of Federal Regulations (CFR), Part 2. For any portion of the information submitted which is entitled to confidential treatment, please assert a confidentiality claim accordingly. EPA will construe the failure to furnish a confidentiality claim with your response to this letter as a waiver of that claim, and information may be made available to the public by EPA without further notice.

While our initial motivation for writing you is knowledge that you received wastes from Rhone-Poulenc, we request you answer the same questions regarding any waste received by you from any facility manufacturing 2,4,5-TCP or using 2,4,5-TCP as a precursor in its manufacturing process.

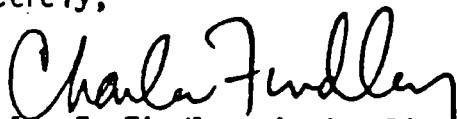
Please address your reply to:

Anita Frankel
Pesticides & Toxic Substances Branch (M/S 524)
U.S. EPA, Region 10
1200 Sixth Avenue
Seattle, Washington 98101

I appreciate your assistance in our efforts to define the extent of this particular contaminant. If you have questions regarding the National Strategy or this inquiry, please contact Anita Frankel at (206) 442-2871.

Please give this matter your immediate attention.

Sincerely,



Charles E. Findley, Acting Director
Air & Waste Management Division

Enclosure